

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.

Defendant.

Crim. No. 17-201 (ABJ)

MOTION TO UNSEAL TRANSCRIPTS

The United States of America, by and through Special Counsel Robert S. Mueller, III, respectfully moves to unseal the sealed portion of the transcripts of sidebar/bench conferences that occurred during the status conferences held in this matter on January 16, 2018, and February 14, 2018. The transcripts of these bench conferences were sealed at the government's request. At the time, the government indicated that the cause for sealing was likely to be mooted in the near future and that the government had no objection to making the transcript available to the public once that happened. The government respectfully submits that unsealing is now appropriate. The government also submits that the transcript of an *ex parte* sidebar discussion between the government and the Court, conducted at the February 14, 2018, status conference should also be unsealed and made available to the public, the cause for sealing having been mooted.

The United States also moves to unseal the transcript of the portion of the proceedings held on February 14, 2018, that pertained to Manafort's motion to modify his bail conditions, subject to any redactions of the defendant's private personal or financial information that he has not already made part of the public record. As the Court advised the parties at that hearing, while there is a basis to seal personal and financial information that is not part of the indictment, there is also

a public interest in disclosure of the parties' communications with the Court more generally. The discussions that occurred during the February 14, 2018, bail hearing predominantly focused on information already in the public record or otherwise not private. Accordingly, the government requests that the transcript of that portion of the hearing be unsealed, subject to any particularized redactions that the defendant may propose by a date to be established by the Court.¹

Respectfully submitted,

ROBERT S. MUELLER III
Special Counsel

Dated: March 1, 2018

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¹ Counsel for the government shared a draft of this motion with counsel for the defendant on February 28, 2018 and sought the defendant's position. As of the time of filing, the government had not been advised of the defendant's position.

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ORDER

Upon consideration of the government's Motion to Unseal Transcripts, it is hereby:

ORDERED that the transcripts of sidebar discussions that occurred during the status hearings held on January 16, 2018, and February 14, 2018, including the transcript of an *ex parte* discussion between the Court and the government on February 14, 2018, shall be unsealed, and it is

FURTHER ORDERED that the transcript of the portion of the February 14, 2018 hearing concerning the defendant's motion to modify his bail conditions shall be unsealed, subject to redaction of defendant's private personal or financial information not already in the public record; and that the defendant shall propose such redactions in a sealed filing on or before March _____, 2018.

Dated: _____

Hon. Amy Berman Jackson
United States District Judge

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FURTHER ORDERED that the transcript of the portion of the February 14, 2018 hearing concerning the defendant's motion to modify his bail conditions shall be unsealed, subject to redaction of defendant's private personal or financial information not already in the public record; and that the defendant shall propose such redactions in a sealed filing on or before March _____, 2018.

Dated: _____

Hon. Amy Berman Jackson
United States District Judge